EPA COMMENTS 8/6/15

Combined Sewer Overflow/Stormwater Outfall Investigation Phase I Total TCDD Verification Memorandum Dated December 2014

No.	General Comments
1	The data validation narratives associated with these data do not contain any specific information or acknowledgement that the total tetrachlorinated dibenzo-p-dioxin (TCDD) verification procedure discussed in this memorandum was performed. There are no standard operating procedure (SOP) checklists or discussion of the review process outlined in the validation SOP titled <i>Total Tetra-Chlorinated Dibenzodioxin, Verification of Total Tetra-Chlorinated Dibenzodioxin Results, Rev. 1, 10/04/06</i> (provided as Attachment A) presented within the data validation narratives or provided under separate cover for the samples associated with the combined sewer overflow/stormwater outfall (CSO/SWO) Phase I sampling events. Please provide a narrative along with any supporting materials regarding the details of the total TCDD verification performed for the Phase I CSO/SWO samples.
2	The Form 1 sample result summaries edited based on data validation findings and included as part of the data validation reports do not contain the corrected result values identified in Table 1 of the memorandum. The Form 1 summary results for total TCDD were redlined with the notation "not validated". Please update the Form 1 sample result summaries with the corrected result values as indicated in Table 1 of the memorandum.
3	Total TCDD verification was not discussed in the <i>Combined Sewer Overflow/Stormwater Outfall Investigation Phase I Data Quality and Usability Assessment Report</i> , dated August 2014. Results related to the total TCDD verification should be included in the data quality and usability report associated with Phase I data.

No.	Page No.	Specific Comments
4	Page 2, Table 1	Please address the following items regarding sample PR1CSOCLYHP-01C (the associated data validation report file is named "CSO_SWO_DV Reports_Event 1_Attempt 3.pdf"):
		a. The original result value is listed in the table as 19.4 picograms per gram (pg/g), but the Form 1 result summary lists a result of 18.1 pg/g for total TCDD. Please verify the original result and update the information contained in Table 1 of the memorandum as necessary.
		b. The corrected result value is listed in the table as 17.8 pg/g, but the value for total TCDD reported in the electronic data deliverable (EDD) is 0.501 pg/g. Please verify the corrected result value and update the information contained in Table 1 of the memorandum and/or the EDD as necessary.
5	Attachment A, Section 2, fifth check item	A detailed logic for the calculation of the total TCDD value needs to be added to this check item. The logic must include how non-detect results are used in the summation if any or all of the TCDD isomer results are reported as non-detect. It must also contain the logic for evaluating data qualifiers that may be associated with any or all of the TCDD isomer results. Please revise the procedure accordingly.